



February 9, 2017

Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

RE: Petition for Waiver of Registration and Certification Requirement of Closed Captioning Rules  
(CG Docket No. 05-231)

NATOA supports the Petition<sup>1</sup> filed by the Alliance for Community Media ("ACM") that seeks a waiver of certain registration and certification requirements for video programmers that provide video programming exclusively to public, educational, and governmental access channels ("PEG channels"). We agree with other commenters<sup>2</sup> that the imposition of such requirements would be a cumbersome and burdensome obligation on thousands of program producers.

As pointed out in ACM's Petition, PEG channels are, for the most part, exempt from closed captioning rules under one or more of the statutory exemption categories, including channels or streams producing revenues of less than \$3 millions. We recognize that the registration and certification requirements imposed on PEG channels themselves may be beneficial to consumers. But to impose those same obligations on video program owners, "most of whom are non-professionals and average citizens who merely wish to use PEG Access channels in their communities,"<sup>3</sup> is an unnecessary regulatory burden.

We strongly encourage the Commission to grant the Petition and exempt from the new registration and certification rules video programmers that provide programming to PEG channels exempt from the Commission's closed captioning rules.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Traylor".

Stephen Traylor  
Executive Director  
NATOA

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<sup>1</sup> ACM Petition for Waiver of Registration and Certification Requirement, CG Docket No. 05-231 (filed Aug. 26, 2016) ("ACM Petition").

<sup>2</sup> See Comments of Community Television Network ("We feel that requiring our local community PEG producers register with the FCC and certify that they are exempt from captioning requirements would be both cumbersome and an unreasonable burden on them.") and Comments of Northampton Community Television ("Requiring community members who use our channels to register with the FCC and certify that they are exempt from captioning requirements would be cumbersome and a deterrent for many producers to use the channels and us as a resource.")

<sup>3</sup> ACM Petition at 2.